

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF TEXAS
 CORPUS CHRISTI DIVISION

United States Courts
 Southern District of Texas
 FILED

AUG 29 2018

ROBBIE DOW GOODMAN;
 WILLIAM CASEY
 RAYMOND COBB,

David J. Bradley, Clerk of Court

Plaintiffs,

Civil Action No. 2:12-CV-166

v.

LORIE DAVIS, Director, TDCJ-CID,

Defendant.

PLAINTIFFS' TRIAL EXHIBIT LIST

EXHIBIT No.	DATE	DESCRIPTION	BATES
P001		article: The Price of Prisons, Prison Spending in 2015	none
P002	August 2008 - August 2018	TDCJ Goodman, Robbie Dow disciplinary file for Aug. 2008 - Aug. 2018	Consol.00981-1016
P003	2012-2013	TDCJ Goodman, Robbie Dow disciplinary file from 10/1/2012 to 08-27-2013	Consol.01151-1167
P004	6/1/2011	TDCJ Offender Grievances records of Robbie Dow Goodman	Consol.00896-958
P005	2011-2018	TDCJ Goodman, Robbie Dow Goodman classification records	Consol.00959-973
P006	7/25/2012	TDCJ Chaplaincy records of Robbie Dow Goodman	Consol.00974-979
P007	8/9/2012	TDCJ Affidavit of Sandra K. Murphy re: Offender Robbie Dow Goodman no grievance records on file related to a Medicine Bag	Consol.00980
P008		INTENTIONALLY LEFT BLANK	
P009	7/21/2016	TDCJ Goodman, Robbie Dow disciplinary list	Consol.01181-1187

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EXHIBIT NO.	DATE	DESCRIPTION	BATES
P010	4/11/2014	TDCJ Casey, William classification records with note "no disciplinary records/reports on file from May 2012 to present for Offender Casey"	Consol.01188-1210 adm 8/29/18
P011	4/29/2014	TDCJ Faith Preference Records for Casey, William	Consol.01213-1214
P012	2013	TDCJ Grievance Records Casey, William	Consol.01215-1266
P013		TDCJ Chaplaincy records of Casey, William	Consol.01267-1303
P014	2013	TDCJ Offender Grievances records of Raymond Cobb	Consol.02145-2165
P015		TDCJ Offender Chaplaincy record Cobb, Raymond	Consol.02385-2392
P016	5/11/2018	TDCJ Affidavit of Michael Rutledge re: number of offenders identifying Native American as religious preference (5,482)	Consol.02398 adm 8/29/18
P017	2/1/2017	TDCJ Offender Orientation Handbook	Consol.2401-2546
P018		INTENTIONALLY LEFT BLANK	
P019 Obj	4/19/2018 Sust. as to article	Longview News Journal: Female inmates in Texas prisons help train service dogs	none adm 8/30/18 as redacted
P020 Obj	4/19/2018 Sust. as to article	Houston Chronicle: Female inmates in Texas prisons help train service dogs	none
P021 Obj	5/21/2018 Sust. as to article	Texas Tribune: Women can do this: female inmates in Texas find fulfillment in learning technical skills, but they have fewer options than men	none adm 8/30/18 as redacted
P022 Obj	2/16/2017 Sust. as to article	She was a sex-trafficking victim, but Texas law labeled her a pimp	none
P023	12/31/2017	California Dept. Corrections and Rehabilitation (CDCR) Budget for Fiscal Year 2016-2017	Consol.02802 adm 8/29/18
P024	8/16/2016	TDCJ Administrative Directive re: Offender Searches	none
P025	2018	TDCJ Chaplaincy Manual	none
P026		TDCJ Ecumenical Order of Worship Services RPD Chaplaincy Department	Consol.00723-727 adm 8/29/18

EXHIBIT NO.	DATE	DESCRIPTION	BATES
P027	8/13/2012	TDCJ 2011-2012 Chaplaincy program Schedule	Consol.00728-742
P028	8/15/2012	TDCJ Religious Faith Preference List McConnell Unit Daily Totals/Percentages by Unit/Unit Type/Agency	Consol.00743-745
P029	8/15/2012	TDCJ Religious Faith Preference List Total Offenders by Faith Code	Consol.00746-752
<u>P030</u>		<u>INTENTIONALLY LEFT BLANK</u>	
<u>P031</u>		<u>INTENTIONALLY LEFT BLANK</u>	
P032	5/23/2012	TDCJ Purchase Order re: annual contract for Native American Chaplaincy Services from 05-23-2012 - 08-31-2012	Consol.00778-783
P033	9/4/2012	TDCJ Affidavit of Karen Hall re: number of adult, male offenders incarcerated at the McConnell Unit on July 31, 2012 (2,883)	Consol.00784
P034	11/30/2004	TDCJ Offender Orientation Handbook	Consol.00785-00895
P035	10/12/2012	TDCJ Inter-Office Memorandum re: Policy regarding the Native American pipe service	Consol.01066-1068
P036		TDCJ Tobacco Policy "BR-151.25"	Consol.01315-1317
P037		TDCJ photographs of Chaplaincy offices at the 10 Native American designated units	Consol.01354-1367
P038	10/1/2010	Federal Register Dept. of the Interior Bureau of Indian Affairs Indian Entities Recognized and Eligible to receive services from the US Bureau of Indian Affairs	Consol.01368-1373
P039	7/1/2012	TDCJ Native American Religious Services and Practices in the TDCJ "Procedures for Religious Programming"	Consol.01386-1388
P040	10/12/2012	TDCJ Inter-Office Memorandum re: Native American weekly services	Consol.001392-1396
P041	7/1/2012	TDCJ Chaplaincy Manual - Religious Devotional Items and Observed Holidays	Consol.01487-1500
P042	7/2/2013	TDCJ Affidavit of Dr. Robert W. Pierce as former Chaplain of McConnell unit stating he was not qualified to provide NA religious services, the pipe service in particular	Consol.01501-1503

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EXHIBIT NO.	DATE	DESCRIPTION	BATES
P043	11/20/2012	TDCJ Native American policies - all revisions in effect from 2008 - 2012; Native American Religion: Prayer Pipe Ceremony	Consol.01505-1507
P044	2011	TDCJ Annual Review for 2011	Consol.01482-1486
P045	2011	TDCJ Chaplaincy Program Schedules for 2011-2012	Consol.01520-1534
P046	2009	TDCJ Native American policies, all revisions in effect from 2008 - 2009 current policies	Consol.01544-1548
P047	2009	TDCJ Native American policies, Religious Devotional Items	Consol.01549-1552
P048	11/10/2012	TDCJ Inter-Office Communications re: NA Circle (Service) allowed ceremony supplies	Consol.01553
P049	6/11/2011	TDCJ Religious Practices Committee minutes for the past five years regarding any requests for kouplock, medicine bags and/or pipes and pipe ceremony	Consol.01554-1570
P050	8/10/2005	TDCJ Administrative directive re: Offenders who refuse to comply with grooming standards	Consol.01589-1591
P051	12/31/2014	TDCJ McConnell Unit Offenders by religious preference	Consol.01628-1631
P052	1/1/2015	TDCJ Offender Orientation Handbook	Consol.01632-1779
P053	5/8/2006	TDCJ Administrative directive re: Religious Programming	Consol.01782-1795
P054	3/31/2015	TDCJ Offenders Housed at McConnell Unit by Custody Data as of March 31, 2015	Consol.01960-1961
P055	3/31/2015	TDCJ Offenders Housed at McConnell Unit claiming Native American as Religious Preference, by Custody, Data as of March 31, 2015	Consol.01962-1963
P056	2013	TDCJ Annual Review for 2013	Consol.01964-2023
P057	8/17/2013	TDCJ Affidavit of Karen Hall re: number of adult, male offenders incarcerated at the McConnell Unit on August 17, 2013 (2,654)	Consol.02053
P058	6/1/2009	TDCJ Native American Religious Services and Practices in the TDCJ "Procedures for Religious Programming"	Consol.02062-2064

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EXHIBIT No.	DATE	DESCRIPTION	BATES
P059	6/1/2009	TDCJ Reassignment to Native American Designated Unit	Consol.02065-2068
P060	11/1/2008	TDCJ Chaplaincy Manual re: Religious Devotional Items and Observed Holy Days	Consol.02072-2120
P061	5/31/2013	TDCJ 3rd Quarter Offender Religious Preference Report	Consol.02299-2310
P062	5/31/2013	TDCJ Offenders on Hand by Unit by Religious Preference Data as of May 31, 2013	Consol.02311-2365
P063	6/30/2013	TDCJ Offenders Assigned to McConnell Unit by Custody	Consol.02383-2384
P064		TDCJ Rehabilitation Programs Division, Chaplaincy Program, Program Overview	none
P065		Del. Dep't of Corrections Policy # 5.3 (June 22, 2015)	None
P066		Idaho Dep't of Correction, Standard Operating Proc. 306.02.01.001	None
P067		Iowa Admin. Code § 201-15.14(3)	None
P068		Kan. Dep't of Corrections, Internal Mgmt. Policy & Proc. # 12-129 (Oct. 15, 2010)	None
P069		Ky. Corrections Policy # 15.1 (Feb. 1, 2013)	None
P070		Maine Dep't of Corrections Policy # 17.3, Prisoner Personal Hygiene, General Guidelines	None
P071		Mich. Dep't of Corrections, Policy Directive #03.03.130 (Feb. 23, 2009)	None
P072		Minn. Dep't of Corrections, Div. Directive # 303.020 (Aug. 5, 2014)	None
P073		N. Mex. Corrections Dep't, Policy #'s CD151100 and 151101	None

EXHIBIT No.	DATE	DESCRIPTION	BATES
P074		N.Y. Dep't of Corrections and Community Supervision, Directive # 4914 (July 6, 2015)	None
P075		Oregon Admin R. 291-123-015	None
P076		Penn. Dep't of Corrections Policy # DC-ADM 807	None
P077		Penn. Dep't of Corrections Policy # DC-ADM 819	None
P078		Tenn. Dep't of Corrections, Admin. Policy & Proc. # 502.03 (June 15, 2009) and 118.01 (Feb. 15, 2014)	None
P079		U.S. Bureau of Prisons, Program Statement 5230.05 (Nov. 4, 1996)	None
P080		W. Va. Div. of Corrections, Policy Directive #334.01 (Sept. 1, 2007)	None
P081		Wyo. Dep't of Corrections, Policy & Proc. # 4.201	None
P082		Arkansas Dep't Correction, AR840 Personal Cleanliness and Grooming for Inmates	None
P083		Alaska Admin. Code tit. 22, § 05.180(c) (2017-2018)	None
P084		Ariz. Dep't of Corr., Department Order No. 704.01 (2013)	None
P085		Cal. Code Regs. tit. 15, § 3062(e) (2016)	None
P086		Colo. Dep't of Corr., Administrative Regulation No. 850-11 § IV(J) (2018)	None

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EXHIBIT No.	DATE	DESCRIPTION	BATES
P087		Conn. Dep't of Corr., Administrative Directive No. 6.10 § 36(B) (2013)	None
P088		D.C. Dep't of Corr., Policy No. 4010.2F §§ 9, 10(d) (2016)	None
P089		Ill. Admin. Code tit. 20, § 502.110(a) (2011)	None
P090		Ind. Dep't of Corr., Policy No. 02-01-104 § X (2013)	None
P091		Kan. Admin. Regs. § 44-12-106(a) (2016)	None
P092		Md. Comm'n on Corr. Standards, Standards, Compliance Criteria, and Compliance Explanations for Adult Correctional Institutions § .05(K) (2012)	None
P093		Mont. Dep't of Corr., Policy No. 4.4.1 § III(H)(3) (2013)	None
P094		Neb. Dep't of Corr. Servs., Administrative Regulation No. 116.01 § III(E) (2017)	None
P095		Nev. Dep't of Corr., Administrative Regulation No. 705.01 § 1 (2014)	None
P096		N.H. Dep't of Corr., Manual for the Guidance of Inmates § II(B)(4)(c) (2011)	None
P097		N.J. Admin. Code § 10A:14-2.5(a) (2016)	None
P098		N.C. Dep't of Pub. Safety Prisons, Policy & Procedures Ch. E, § .2107 (2014)	None
P099		N.D. Dep't of Corr. & Rehab., North Dakota Correctional Facility Rules r. 69 (2016)	None

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EXHIBIT NO.	DATE	DESCRIPTION	BATES
P100		Ohio Admin. Code 5120-9-25(A), (D) (2016)	None
P101		Okla. Dep't of Corr., Operations Memorandum No. OP-030501 § III (2018)	None
P102		S.D. Dep't of Corr., Inmate Living Guide (2017)	None
P103		Utah Dep't of Corr., Inmate Orientation Handbook (2013)	None
P104		Wash. Dep't of Corr., Policy No. DOC 440.080 (2017)	None
P105		Wis. Admin. Code DOC § 309-24(3) (2016)	None
P106		Religious Freedom and Inmate Grooming Standards, D. Sidhu (2012)	None
P107		Appendix B from Religious Freedom and Inmate Grooming Standards, D. Sidhu (2012)	None
P108	9/25/2017	Alabama Department of Corrections Male Inmate Handbook	None
P109	7/20/2017	Florida Administrative Code 33-602.101 Care of Inmates	None
P110		Georgia Department of Corrections Inmate Handbook	None
P111	12/29/2008	Hawaii Department of Corrections Policy No. COR.10.1F.05 - Personal Hygiene	None
P112		INTENTIONALLY LEFT BLANK	

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EXHIBIT NO.	DATE	DESCRIPTION	BATES
P113	6/1/2016	Mississippi Department of Corrections Inmate Handbook, Section VI, IV(D)	None
P114		Missouri Eastern Correction Center Offender Handbook (September 2010)	None
P115		Massachusetts Department of Correction 103 DOC 750 Hygiene Standards	None
P116		Rhode Island Department of Corrections Inmate Rulebook (2013)	None
P117	11/1/2006	South Carolina OP-22.13, "Inmate Grooming Standards"	None
P118		Vermont Northeast Regional Correctional Facility Inmate Handbook (May 2010)	None
P119	8/1/2016	Virginia OP 864.1 Offender Grooming and Hygiene	None
P120		§ 277.7. Compelling Haircuts, 37 TX ADC § 277.7	None

Dated this 20th day of August, 2018.

Respectfully submitted

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/s/ Robert K. Ellis

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ATTORNEYS FOR PLAINTIFF

Certificate of Service

I certify that on the 20th day of August, 2018, a copy of this document was served on all counsel of record using the Court's e-filing system.

/s/ Steven C. Messer

Steven C. Messer